

REMARKS

The present communication responds to the Office Action mailed September 8, 2005. In that Office Action, the Examiner rejected claims 1, 3-5, 10-22 and 24 of the present application. The rejections are traversed and reconsideration is requested at least because none of the cited references disclose “a die frame slidably secured to the chase to allow adjustment of the die frame along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end,” as recited by claim 1, as amended, or “providing a die fixture including a chase, the chase defining a vertical and horizontal axis and comprising first and second vertical ends and first and second horizontal ends, and a die frame slidably secured to the chase to allow the die frame to slide along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end,” as recited by claim 24, as amended.

Rejection Under U.S.C. § 103

Ginsburg in view of Gerson

Claims 1, 3-5 and 24 were rejected under 35 USC 103(a) as being unpatentable over U.S. Patent No. 921,974 to Ginsburg in view of U. S. Patent No. 3,150,582 to Gerson. This rejection is traversed for at least the following reasons.

Ginsburg teaches an interchangeable letter embossing die. The Examiner asserts that Ginsburg teaches an apparatus for adjusting a die printing press comprising a chase (A, Fig. 1) defining a vertical axis and horizontal axis, a die frame (B, Fig. 1) slidably secured to the chase to allow the adjustment of the die frame in the (“frame may be adjusted to its proper central position,” p. 1, lines 62-63).

Claim 1, as amended, recites: “a die frame slidably secured to the chase to allow adjustment of the die frame along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end”. Ginsburg teaches only very limited movement of a die frame within a chase through proper actuation of set screws.

Specifically, Ginsburg's teaching is limited to only that movement wherein a die frame is adjusted to a sole desired position, which is central with respect to a chase. Ginsburg explains:

The set screws A' will engage the sides of this frame, and by adjusting the set screws relatively to each other the internal frame B may be adjusted to its proper central position with reference to the frame or chase A and be rigidly held therein. *Ginsburg, page 1, lines 59-65.*

In contrast, claim 1, as amended, provides for adjustment of a die frame from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end.

Gerson teaches a photo offset plate making machine. Gerson does not teach, at least, an apparatus wherein the at least one horizontal guide and the at least one vertical guide are secured within the chase. The term "chase" is defined in the pending application's specification as follows:

Chase 20 defines a vertical axis 12 and a horizontal axis 14. Vertical axis 12 and horizontal axis 14 generally form a plane within which the positions of die 100 may be slidably adjusted. (*Specification, p. 6*).

Employing this definition in the context of Gerson, the chase is properly described as the plane within which the negative carrier support may be slidably adjusted. This plane, however, is limited to the area of the lithographic plate support 22. Gerson explains:

In the photolithographic process, it is frequently desirable to have multiple images in spaced and predetermined positions on the photolithographic plate. *Gerson, Column 1 lines 12-14.* It is therefore among the principal objects of the present invention to provide an improved machine . . . wherein certain of the components used enable the precise registering of the negatives, with respect to the lithographic plate. *Gerson, Column 1 lines 32-36.*

Gerson teaches only vertical guides 59, 60 that extend beyond lithographic plate support 22. (*Fig. 1*). Thus, Gerson does not disclose an apparatus with "at least one horizontal guide secured within the chase and at least one vertical guide secured in the chase."

The applicants respectfully note that, at least, Gerson does not teach an apparatus wherein a horizontal guide block is movably secured to a chase to slide along the horizontal axis. Particularly, Gerson teaches only an apparatus wherein two horizontal mounts 61, 62 that allow movement along the horizontal axis. Thus, Gerson does not, in fact, disclose an apparatus with “a horizontal guide block movably secured to the chase to slide along the horizontal axis,” as recited in amended Claim 1.

Neither Ginsburg nor Gerson, alone or in combination, disclose, teach or suggest “a die frame slidably secured to the chase to allow adjustment of the die frame along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end” and “a horizontal guide block movably secured to the chase to slide along the horizontal axis,” as recited by Claim 1, as amended. Nor do Ginsburg or Gerson, alone or in combination, disclose, teach, or suggest providing a die fixture including a chase, the chase defining a vertical and horizontal axis and comprising first and second vertical ends and first and second horizontal ends, and a die frame slidably secured to the chase to allow the die frame to slide along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end,” as recited by claim 24, as amended. Thus, the applicants respectfully assert that claims 1, 3-5, 24 are patentable over Ginsburg in view of Gerson. Accordingly, it is respectfully requested that the rejection of claims 1, 3-5, 24 under 35 U.S.C. § 103(a) as being unpatentable over Ginsburg in view of Gerson be withdrawn.

Ginsburg in view of Gerson and further in view of Leibovich et al.

Claims 10, 12, 17 and 18 were rejected under 35 USC 103(a) as being unpatentable over U.S. Patent No. 921,974 to Ginsburg in view of U.S. Patent No. 3,150,582 to Gerson and further in view of U. S. Patent No. 4,723,086 to Leibovich et al. This rejection is traversed at least for the following reasons.

As discussed above, neither Ginsburg nor Gerson, alone or in combination, disclose, teach or suggest “a die frame slidably secured to the chase to allow adjustment of the die frame along the chase from the first vertical end to the second vertical end and from the first horizontal

end to the second horizontal end” and “a horizontal guide block movably secured to the chase to slide along the horizontal axis,” as recited by Claim 1, as amended.

Leibovich et al. disclose a coarse and fine motion positioning mechanism. Leibovich et al. do not correct the fundamental teaching deficiencies of the Ginsburg and Gerson combination. Thus, it is respectfully submitted that the combination of Ginsburg, Gerson and Leibovich et al. does not make obvious claim 1.

As each of claims 10, 12, 17 and 18 depends either directly or indirectly from claim 1, the applicants respectfully assert that claims 10, 12, 17 and 18 are patentable over Ginsburg in view of Gerson and further in view of Leibovich et al. Accordingly, it is respectfully requested that the rejection of claims 10, 12, 17 and 18 under 35 U.S.C. § 103(a) as being unpatentable over Ginsburg in view of Gerson and further in view of Leibovich et al. be withdrawn.

Ginsburg in view of Gerson and Leibovich et al. and further in view of Posh

Claims 11, 13 and 19 were rejected under 35 USC 103(a) as being unpatentable over U.S. Patent No. 921,974 to Ginsburg in view of U.S. Patent No. 4,723,086 to Leibovich as applied to claims 10, 12 and 18 and further in view of U.S. Patent No. 3,449,970 to Posh. This rejection is traversed at least for the following reasons.

As discussed above, neither Ginsburg, Gerson nor Leibovich et al., alone or in combination, disclose, teach or suggest “a die frame slidably secured to the chase to allow adjustment of the die frame along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end” and “a horizontal guide block movably secured to the chase to slide along the horizontal axis,” as recited by Claim 1, as amended.

Posh teaches a linear actuator. Posh does not correct the fundamental teaching deficiencies of the Ginsburg, Gerson and Leibovich et al. combination. Thus, it is respectfully submitted that the combination of Ginsburg, Gerson, Leibovich et al. and Posh does not make obvious claim 1.

As each of claims 11, 13 and 19 depend either directly or indirectly from claim 1, the applicants respectfully assert that claims 11, 13 and 19 are patentable over Ginsburg in view of Gerson and Leibovich et al. and further in view of Posh. Accordingly, it is respectfully requested that the rejection of claims 11, 13 and 19 under 35 U.S.C. § 103(a) as being unpatentable over Ginsburg in view of Gerson and Leibovich et al. and further in view of Posh be withdrawn.

Ginsburg in view of Gerson and Leibovich et al. and further in view of Gortner

Claims 14-16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 921,974 to Ginsburg in view of U.S. Patent No. 3,150,582 to Gerson and U.S. Patent No. 4,723,086 to Leibovich et al. and further in view of U.S. Patent No. 6,598,868 to Gortner. This rejection is traversed at least for the following reasons.

As discussed above, neither Ginsburg, Gerson nor Leibovich et al., alone or in combination, disclose, teach or suggest “a die frame slidably secured to the chase to allow adjustment of the die frame along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end” and “a horizontal guide block movably secured to the chase to slide along the horizontal axis,” as recited by Claim 1, as amended.

Gortner teaches a clamp mechanism. Gortner does not correct the fundamental teaching deficiencies of the Ginsburg, Gerson and Leibovich et al. combination. Thus, it is respectfully submitted that the combination of Ginsburg, Gerson, Leibovich et al. and Gortner does not make obvious claim 1.

As each of claims 14-16 depends either directly or indirectly from claim 1, the applicants respectfully assert that claims 14-16 are patentable over Ginsburg in view of Gerson and Leibovich et al. and further in view of Gortner. Accordingly, it is respectfully requested that the rejection of claims 14-16 under 35 U.S.C. § 103(a) as being unpatentable over Ginsburg in view of Gerson and Leibovich et al. and further in view of Gortner be withdrawn.

Ginsburg in view of Gerson, Leibovich et al. and Gortner and further in view of Posh

Claims 20-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 921,974 to Ginsburg in view of U.S. Patent No. 3,150,582 to Gerson and U.S. Patent No. 4,723,086 to Leibovich et al. and U.S. Patent No. 6,598,868 to Gortner and further in view of U.S. Patent No. 3,449,971 to Posh. This rejection is traversed at least for the following reasons.

As discussed above, neither Ginsburg, Gerson, Leibovich et al., nor Gortner, alone or in combination, disclose, teach or suggest “a die frame slidably secured to the chase to allow adjustment of the die frame along the chase from the first vertical end to the second vertical end and from the first horizontal end to the second horizontal end” and “a horizontal guide block movably secured to the chase to slide along the horizontal axis,” as recited by Claim 1 as amended.

Posh teaches a linear actuator. Posh does not correct the fundamental teaching deficiencies of the Ginsburg, Gerson, Leibovich et al. and Gortner combination. Thus, it is respectfully submitted that the combination of Ginsburg, Gerson, Leibovich et al., Gortner and Posh does not make obvious claim 1.

As each of claims 20-22 depend either directly or indirectly from claim 1, the applicants respectfully assert that claims 20-22 are patentable over Ginsburg in view of Gerson, Leibovich et al. and Gortner and further in view of Posh. Accordingly, it is respectfully requested that the rejection of claims 20-22 under 35 U.S.C. § 103(a) as being unpatentable over Ginsburg in view of Gerson, Leibovich et al. and Gortner and further in view of Posh be withdrawn.

CONCLUSION

This application now stands in allowable form and reconsideration and allowance is respectfully requested.

Should any fees be necessary, the Commissioner is hereby authorized to charge any deficiencies or credit any overpayment to Deposit Account No. 04-1420.

Respectfully submitted,

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